

FILED

MAY - 7 2014

U. S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

TIMOTHY CHARLES SAWYER,

and

KATIE RENEE SAWYER,

Defendants.

4:14CR142 ERW/DDN

INDICTMENT

COUNT I

The Grand Jury charges that:

At all times pertinent to the charges in this indictment:

1. Federal law defined the term
 - (a) "minor" to mean any person under the age of eighteen years (18 U.S.C. § 2256(1));
 - (b) "sexually explicit conduct" to mean actual or simulated--
 - (i) sexual intercourse, including genital-genital, anal-genital, oral-genital, oral-anal, whether between persons of the same or opposite sex,
 - (ii) bestiality,
 - (iii) masturbation,
 - (iv) sadistic or masochistic abuse, or

(v) lascivious exhibition of the genitals or pubic area of any person (18 U.S.C. §2256(2)(A));

(c) "computer" to mean an electronic, magnetic, optical, electrochemical or other high speed data processing device performing logical, arithmetic or storage functions, including any data storage facility or communications facility directly related to or operating in conjunction with such device. (18 U.S.C. § 2256(6));

(d) "child pornography" to mean any visual depiction, including any photograph, film, video, picture, or computer or computer-generated image or picture, whether made or produced by electronic, mechanical, or other means, of sexually explicit conduct, where--

(A) the production of such visual depiction involves the use of a minor engaging in sexually explicit conduct; or

(C) such visual depiction has been created, adapted, or modified to appear that an identifiable minor is engaging in sexually explicit conduct. (18 U.S.C. §2256(8)).

2. The "Internet" was, and is, a computer communications network using interstate and foreign lines to transmit data streams, including data streams used to store, transfer and receive graphic files.

3. Between on or about October 24, 2013, and on or about December 10, 2013, within the Eastern District of Missouri and elsewhere,

TIMOTHY CHARLES SAWYER and KATIE RENEE SAWYER,

the defendants herein, acting together, knowingly received images and videos of child pornography using any means or facility of interstate and foreign commerce, that is, the

defendants received graphic image files via the Internet which contained child pornography, including, but not limited to, the following:

1. “pthc-jho-lolifuck) 10 yo katrina - doggystyle (new 2007)(2).wmv,” also referred to as “0003-0000.wmv” – a graphic video file that depicted, in part, males engaging in sexual intercourse with a prepubescent minor female;

2. “[L3][Kids] Child Porn - Girl And Boy 6Yo And 8Yo Having Sex First Time.mpg,” also referred to as “0004.0000.mpg” – a graphic video file that depicted, in part, a minor male and minor female engaging in sexual intercourse and mutual masturbation;

3. “PTHC - 11yr old fingered and fucked, very tight pussy.l.mpg” – a graphic video file that depicted, in part, a finger being inserted into the vagina and anus of a minor female, and a male engaging in sexual intercourse with a minor female; and

4. “My_family_incest_Serie_2011_Julia_8yo_Lisa_4yo_Mike_7yo_Lara_8yo_hot_30min.wmv” – a graphic video file that depicted, in part, a compilation of videos of males engaged in sexual and anal intercourse with prepubescent minor females;

In violation of Title 18, United States Code, Sections 2252A(a)(2) and 2.

COUNT II

The Grand Jury further charges that:

1. The allegations contained in paragraphs one and two of Count I of this Indictment are incorporated by reference as if fully set forth herein.

2. Between on or about October 24, 2013, and on or about December 10, 2013, within the Eastern District of Missouri and elsewhere,

TIMOTHY CHARLES SAWYER and KATIE RENEE SAWYER,

the defendants herein, acting together, did knowingly possess material that contained images and videos of child pornography that was produced using materials that traveled in interstate commerce, to wit, a PNY 32GB thumb drive that was produced outside Missouri and therefore has traveled in interstate and foreign commerce, and said thumb drive contained child pornography, including but not limited to the following:

1. “awesome preteen compilation 2.mpg” – a graphic video file that depicted, in part, a compilation of videos involving prepubescent minor females in a lascivious display of their genitals, males engaged vaginal and anal sexual with prepubescent minor females;
2. “Vicky - Pedofilia 13 anos [pedo preteen 13yo lolita BDSM bondage ropes] 15m32s.mpg” - a graphic video file that depicted, in part, a bound prepubescent minor female in a lascivious display of her genitals, a male engaged in oral sex with the prepubescent minor female, and a male engaged in anal intercourse with the prepubescent minor female;
3. “Valya - 14.avi” - a graphic video file that depicted, in part, a prepubescent minor female in a lascivious display of her genitals, a prepubescent minor female performing oral sex on a male, and a male engaging in sexual intercourse with a prepubescent minor female; and
4. “Pedo - Pthc - Jenny 9yo Daughter - Zoo 5Yo Girl Dog And Man 2007 -Se-(1).avi” - a graphic video file that depicted, in part, a bound prepubescent minor female involved in bestiality and a male engaging in sexual intercourse with the prepubescent minor female;

In violation of Title 18, United States Code, Sections 2252A(a)(5)(B) and 2.

A TRUE BILL.

FOREPERSON

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